

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	GC Docket No. 17-59
Advanced Methods to Target and Eliminate)	
Unlawful Robocalls)	
)	FCC 17-90
)	

COMMENTS OF NOBLE SYSTEMS CORPORATION

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I. INTRODUCTION AND SUMMARY

Noble Systems is a provider of contact center software and hosted service solutions serving customers in a variety of industries and applications, both domestically and internationally. Noble System submits these comments in regard to the Commission’s Second Notice of Inquiry (“NOI”)¹ in regard to the problem of targeting and eliminating unlawful robocalls made to phone numbers of consumers using a reassigned telephone number (the “reassigned number problem”).

Noble Systems believes the Commission has embarked in a well-intentioned, but misguided attempt, to solve a tangential and relatively minor problem related to the overall problem of illegal robocalls. While illegal robocalls are the number one consumer complaint to the FCC and the FTC, this should not be conflated with the problem of inadvertent calls being made to reassigned numbers. The problem of inadvertent calls to reassigned numbers comprises a relatively small problem that is overshadowed by the larger problem of illegal robocalls in general. These are different problems, and the scope of the problem of the latter (illegal robocalls) does not justify the solution proposed for the former (reassigned number problem).

The problem described in the NOI does not justify such a complex and expensive solution that promises, at best, to be only marginally better than current number validation services. Its impact on service providers will be expensive and complicated. It is unclear what benefits, if any, it will provide over existing services that validate a reassigned number. Finally, the effectiveness of having a national reassigned number database is questionable if its use is not mandated. The Commission should consider impacts of other technologies that will impact the degree that consumers receive unwanted calls and which will likely mitigate calls to reassigned numbers. Hence, the overall value of this approach is highly questionable, and the benefits should be further quantified before the Commission proceeds down this path.

A relatively simple solution to the “reassigned number” problem is to utilize actual notice, as opposed to the current form of constructive notice, as the point when the call originator incurs liability under the TCPA for making subsequent calls. This approach should be coupled with requirements mandating each call originator offer certain defined channels that a called party can

¹ In the Matter of: Advanced Methods to Target and Eliminate Unlawful Robocalls, GC Docket No. 17-59 (FCC 17-90), released July 13, 2017.

use to provide actual notice of their reassigned number status. This solution provides a simple means for a called party to provide actual notice to the call originator and provides much sought out clarity to call originators on the reassigned number problem.

II. Background

When a subscriber obtains a new telephone number, for either wireline or wireless service, there is the possibility that the current subscriber may receive calls intended for the prior subscriber of that number. Typically, calls to the current subscriber will either be: a) answered, in which case the subscriber will likely hear a recorded announcement or speak with a live person, b) not answered, in which case the caller ID (in the form of a calling party number) may show upon the subscriber's caller ID device, or c) the call will be answered by a voicemail service or an answering machine. In this last case, a record of the caller ID is typically retained for the subscriber to review.

If the subscriber answers the call and speaks to the live person, then upon learning the call was intended for another person the subscriber will typically inform the caller that the desired party is no longer at this number. If the caller encounters an announcement, likely the subscriber may not be able to ascertain whether the call was intended for them or the prior subscriber. If the subscriber suspects the call was for a prior subscriber, and they wish the calls to stop, the subscriber may dial the calling party number in an attempt to inform the caller of the reassigned number situation. This may or may not be effective.

If the subscriber does not answer the call, a record of the calling party number will be shown on their caller ID device. Typically, a single call is not a significant annoyance to the subscriber, but several calls from the same calling party number may prompt the subscriber to call back that number and inquire about the purpose of the calls. If the subscriber learns that the calls were directed to another party, then the subscriber will no doubt inform the caller and request that the calls cease. Similarly, if calls are recorded on the subscriber's voice mail or answering machine, the subscriber may know from the message that the calls are intended for a prior subscriber, in which case the subscriber may call back the originator to request that the calls cease.

It may be obvious, but it is nevertheless important to recognize that the “reassigned number problem” occurs when a caller intending to reach a particular person (e.g., “Mr. Smith”) at a particular number instead reaches another person (e.g., Ms. Doe). Specifically, the call was intended for a different person, but that number was reassigned to another person. It is *not* a reassigned number problem when the caller dials that number without caring who answers the call. Stated differently, an illegal robocaller dialing a number, not intending to reach any particular individual, is not an example of the reassigned number problem. It is an example of an illegal robocaller violating a do-not-call list, perpetuating a scam, and/or ignoring a host of other statutes and regulations. However, this is not an example of a call being inadvertently directed to the current subscriber of the number.

The fact that a subscriber may get one, two, or even several calls, intended for the prior subscriber is an inconvenience for the current subscriber. However, Commission has not presented evidence that this by itself is a significant harm that is causing consumers to complain to the Commission or regulators. However, the problem is exacerbated and becomes a significant harm when one of the following occurs:

1. The subscriber *informs* the caller that they are not the desired party and requests the calls to stop, but the caller ignores the request and repeatedly calls intending to reach the prior subscriber.
2. The subscriber *cannot inform* the caller that they are not the intended party because an announcement is played, the calling party number is not provided, or if provided, the calling party number when dialed is unassigned, unanswered, or reaches a recording and then hangs up. In other words, the subscriber cannot inform the caller that they are not the intended party, and thus cannot make a request that the calls cease.

In summary, being unable to inform the caller of the reassigned number status, or being ignored after informing the caller, means the subscriber will continue to receive calls, and this is annoying, frustrating, and demeaning to the current subscriber of that number.

III. The Commission Is Conflating The Problem Of Illegal Robocalls With The Problem Of Calls To Reassigned Numbers

Noble Systems use a definition of a robocall consistent with the Federal Trade Commission's definition, which are calls that automatically play a pre-recorded announcement to the called party upon being answered. Using this definition, not all robocalls are illegal, and the matter captioned in the NOI states it is in regard to "Advanced Methods to Target and Eliminate Unlawful Robocalls."

The problem of an illegal robocall to a reassigned number necessarily involves calls *inadvertently* made to the current subscriber. Once the subscriber informs the caller that the intended party is no longer at the number, then any subsequent calls received are no longer an example of a reassigned number problem, but of a different problem. Specifically, after the subscriber provides actual notice of the number having been reassigned, the caller is *purposefully* directing calls after being informed the intended party is not located at that number. Once actual notice is provided to the caller, the call originator cannot legitimately argue that they were under a mistaken impression. Thus, the "reassigned number problem" is limited to the calls made prior to the caller being informed that the number was reassigned.

The FCC has adopted a framework where the first call to a reassigned number is presumed to provide "constructive notice" to the caller. Thereafter, any calls made by the call originator subjects the caller to TCPA liability. "Constructive notice" is a form of legal fiction where the caller should have known of the reassigned number status, even if the call was unanswered. Many contact center operators employ equipment which can detect a call that encounters a "disconnected" or "not in service" intercept announcement, which will update their calling records appropriately. However, once the number is reassigned, the caller will not encounter such announcements. Similarly, if the call is answered and they are informed by the called party of the reassigned number status, the agent will update their calling records. However, if the call is not answered, reaches a busy condition, or is answered by voice mail or an answering machine, then the call originator has no way of receiving actual notice that the number was reassigned. By employing a "constructive notice" standard, the caller is presumed to have notice, but contact center operators find this standard as fundamentally unfair.

The vast majority of illegal robocall complaints involve calls from entities who are not targeting any particular individual, but seeking to interact with *any* person answering the call. These include telemarketing robocalls that violate the Do-Not-Call list. The complaints for these calls should not be interpreted as warranting a solution for the reassigned number problem, because these are not calls targeting a specific individual and inadvertently reaching another individual. The Commission should not use the generalized consumer robocall complaint data as the basis for justifying a solution to the reassigned number problem. If the Commission has data specific to the reassigned number problem, it should disclose that. If not, then Commission should determine whether the scope of the problem justifies the proposed solution.

IV. Alleged Support for a Reassigned Number Database Solution

Noble Systems questions the Commission’s statement of “broad support” for a reassigned number database solution.² The alleged support for this solution must be tempered by several aspects.

First, several industry players are in the business of providing various forms of “number scrubbing” type services and presently offer various forms of reassigned number verification services. Further, since comments were received in the 2014 on this issue, there may be additional service providers offering reassigned number verification services. These companies will likely advocate this solution, as it is a potential enhancement to an existing revenue source.

Second, consumers who have been bombarded by illegal robocalls and incessant scam calls would be expected to support this, *or any other solution*, that purports to minimize illegal robocalls. Noble System does not in any way intend to minimize the goal of consumers or the Commission to minimize illegal robocalls, and believe the focus should be on an *effective* solution. As detailed later herein, Noble Systems believes that focusing on a long term solution (such as the so called “Shaken & Stir” protocols) will be effective in reducing the overall problem of illegal robocalls. Developing a national reassigned number database may detract from allocating resources that would otherwise be used to develop an effective long-term solution. To the extent that a national reassigned number database deployment may adversely impact development of a

² FCC 17-90, par. 1.

long-term solution, it is another reason why a national reassigned number database should not be supported.

The Commission should also ask consumer groups whether they would support a mandatory mechanism (as detailed later herein) that consumers could use to inform call originators of their reassigned number status and request cessation of inadvertently directed calls. No doubt, consumer groups would also support mandating this capability to provide consumers a way that their requests can be made and honored.

As for the “robocallers” supporting a national reassigned database solution, the Commission should keep in mind that the current regulatory position of “one free call” as providing constructive notice of the number reassignment *is an untenable solution* for legitimate call center operators. The rapid rise of TCPA class actions has caused legitimate call originators to welcome *any approach* to minimize liability, given the current ambiguous and unworkable framework. What the Commission should ask is whether contact center operators would rather support: 1) a mandate that they must use a national reassigned number database, or 2) support the actual notice solution detailed herein. No doubt, most contact center operators would support the solution propose herein.

Thus, the Commission should carefully interpret whether there is support to develop a nation-wide reassigned number database and whether there is any support by call originators to utilize such services. Services to validate reassigned number status are presently available, but many operators do not use such services because of their high cost. Because call center operators could elect to use such services today, but many do not, the Commission should not presume that they would be any more likely to use a national reassigned number database.

V. The Link Between A Reassigned Number Database And Improving TCPA Compliance Has Is Tenuous

The Commission states in the NOI that “we seek comment on ways we could exercise our numbering authority to *require* service providers to report information about number

reassignments *for the purposes* of reducing *unwanted robocalls* and *improving TCPA compliance*.”³

First of all, the Commission presumes a link between the mere existence of such a reassigned number database and achieving the goal of reducing “unwanted robocalls” and “improving TCPA compliance.” *Merely because the database is developed and available does not mean it will be used.* Expending vast sums of money, time, and effort to develop this national reassigned number database does not mean it will accomplish the goals any more than defining a national Do-Not-Call database has reduced illegal telemarketing calls. Many operators today do not use existing reassigned number validation services. If the Commission intends to mandate its use by call center operators, then obviously legal call center operators will use what is mandated, but illegal operators will likely not. As an example, the existence of the DNC infrastructure has not stopped illegal operators for making telemarketing calls to those numbers on the DNC list.

Second, the scope of reducing “unwanted robocalls” appears to be a euphemism for “unwanted, *legal* robocalls.” Since this matter is directed to “eliminate unlawful robocalls” and the specific topic involves calls to reassigned numbers, the issue of “unwanted” should not be relevant. The goal is to address the illegal calls to reassigned numbers, which are calls intended for a particular person, but who is no longer the subscriber of the dialed number. Addressing inadvertent calls to the wrong subscriber is relatively narrow in scope from the overall problem of illegal calls.

Improving TCPA compliance is an appropriate goal, but the Commission should consider whether mandating service providers to report such information without mandating contact center operators to use the database will, by itself, achieve the stated goals. There are several providers who already provide reassigned number validation services to address the reassigned number problem.⁴ Further, several of these providers purportedly offer a relatively high level of accuracy in being able to detect whether a number for a subscriber was reassigned. Thus, there is an existing, albeit nascent, infrastructure established that could be accessed by service providers.

³ FCC 17-90, par. 9, emphasis added.

⁴ See, e.g., *Id.*, footnote 16.

Thus, the mere the existence of this service presumably has not caused a reduction in overall unwanted robocalls, nor a significant increase in TCPA compliance. (If it did, then there would be no need for the Commission to issue the current NOI.) The reasons why the existing infrastructure has not solved the problems of reducing unwanted calls or significantly increasing TCPA compliance can be speculated.

The first possibility is that the cost for using these services may be too expensive and that the costs outweigh the potential benefits.⁵ Presumably, if existing reassigned number database service providers augment their current infrastructure to interact with a national database, then this will increase their costs. Assuming the same customer base, then the cost of the service would be expected to increase.

A second possibility is that the existing reassigned number validation services may not provide a desired level of accuracy. However, many providers purport their service provides a high level of accuracy, frequently 80% or higher. Would the number of users significantly increase if the accuracy were increased to, e.g., 90% or 95%?

A third possibility is that those originating illegal robocalls do not care about compliance, nor who is answering the call. These illegal robocallers will not pay reassigned number validation service providers to ascertain whether a number is reassigned. Those originating illegal robocalls are not targeting a particular person at a given number, and hence do not know, nor care, who answers the call. This is not an inadvertent call, but rather is an indiscriminate call.

Mandating service providers provide number status to a national reassigned number database means in all likelihood that a more accurate reassigned number database service will be available, but that does not mean call originators will use the service. If the service is not used, then the Commission's intended goals would likely not be achieved. Existing call originators may have various reasons why they are not using such a service today, and those reasons may apply when a national reassigned number database is implemented.

The possibility of call originators not using such a reassigned number validation service could be addressed by the Commission in two ways. First, the Commission could issue a mandate

⁵ Presumably, the Commission is aware of such prices. It would be inappropriate to report such pricing information in a public proceeding.

that all call originators must use such a service. This approach would also address a fundamental issue of how costs would be recovered for carriers participating in this national reassigned number database, because a mandated base of users would be created. However, this approach would garner significant opposition from call center operators and Noble Systems does not in any way support any form of a mandate that such services must be used.

Second, the Commission could grant a “safe harbor” for those using opting to use such a service, thus encouraging its use. This second option *can be done today* with the existing reassigned number validation services, and avoids the Commission creating a mandate for the development of a national reassigned number database. Thus, the Commission could encourage use of existing services by defining a safe harbor today without the massive expenditure of time, effort and resources to create a national reassigned number database. Further, by defining a safe harbor for using current services, the Commission would gain experience and knowledge of its efficacy and the questions raised in the NOI could be addressed if needed in the future. It is possible that by encouraging the use of existing reassigned number validation services the Commission’s goals of improving TCPA compliance may be largely achieved.

Noble Systems notes that mandating carriers to participate in a national reassigned number database is likely to incur significant costs on the carriers. If the Commission grants a safe-harbor to users of this new infrastructure (as opposed to a mandate requiring its use) and if there are an insufficient number of users, then this exposes the carrier’s infrastructure to a failure of recouping costs, and raises questions of how the costs are to be borne. These issues must be addressed in advance of any carrier mandate to participate in such infrastructure. This provides another reason why the Commission should not mandate creation of such an infrastructure.

VI. It Is Unclear How Much Of An Improvement Will Be Achieved By Mandating A National Reassigned Number Database

Existing service providers currently offer reassigned number validation services, and claim high levels of accuracy (80% or higher). No doubt, there can be an improvement in accuracy by mandating carriers report number assignment information in real-time. However, mandating a national, reassigned number database is likely to be at least as complicated, expensive, and time

consuming as was the development of the Number Portability Administration Center (“NPAC”) number portability database or the national Do-Not-Call (“DNC”) database. The DNC database took 10+ years to come into effect, and will cost its users over \$17,000 a year to access all area codes in 2018. The number portability database is paid for by “LNP” contribution factor mandated on all carriers. Imposing similar costs on call originators for national reassigned number database is a significant impact. If costs are not imposed on all call originators, then the costs allocated per user would increase because the costs are shared over a smaller base of users.

The cost-vs-benefit analysis of defining a national reassigned number database must then consider the benefits of expending these costs. Presumably, the benefit would be an increase in accuracy over what currently available services would provide. Would the accuracy increase from e.g., 80% to 90%? Perhaps to 95%? Would the incremental increase in accuracy compared to current available services be worth the costs? The Commission must perform a cost-versus-benefits analysis in order to justify this effort.

VII. The Scope Of The Reassigned Number Problem Is Smaller Than The Robocall Problem

The scope of the reassigned number problem begins with the second inadvertent call to the reassigned number and ends when the called party informs the caller that the person being contacted is not at that number. Any calls thereafter are *not* a reassigned number problem. It is then a problem of the caller ignoring information indicating the intended individual is not at that number. If the caller chooses to ignore such information when the called party informs them, then why would the caller choose to heed such information when informed by querying a national database of reassigned numbers? Why would such a caller be expected to even query such a database?

Once the call originator is informed by the called party that the intended person was no longer at that number, the call originator would perform a skip-trace operation or could access a number validation service to verify the name/number combination. If the call originator determines the number is obsolete, they should not continue calling that number using an autodialer. If they do, then they should be subject to willful damages under the TCPA for

knowingly calling the wrong party. *Again, at this point it is not a reassigned number problem.* Fortunately, legitimate and compliant call center operators have no interest in calling the wrong party. However, illegitimate or non-complaint call center operators that are not calling a particular person would not be expected to perform a skip-trace or reassigned number validation. These non-compliant call center operators would be subject to liability under the TCPA as currently defined.

Thus, the scope of the problem of inadvertent calls to a reassigned number usually involves a limited number of calls prior to the caller being informed of the change in status. Once the called party informs the caller, the problem is not an inadvertent call to a reassigned number, but a blatant disregard of the TCPA by knowingly calling a person without their consent.

VIII. The Proposed Framework The Commission Should Consider

The Commission should consider a change in the regulatory interpretation of what constitutes “notice” to the call originator that a number has been reassigned. The Commission should change the basis from “constructive notice” based on one call (which may or may not be answered) to “actual notice.” Actual notice occurs when the called party informs the caller that the intended party is no longer at that number. Any calls made thereafter to that wrong party are calls willfully made without their consent. Liability under the TCPA will motivate legitimate call originators to avoid knowingly making calls to incorrect parties.

This scheme requires a clear and simple method for called parties to indicate the call has reached an unintended party (i.e., the number is reassigned). There are several opportunities that can be defined for the called party to provide actual notice. If the called party is speaking to an agent, the called party can provide actual notice to the agent. If the called party hears an announcement, the called party may be able to interact with an interactive menu allowing them to speak to an agent or could call back the number on their called ID. The Commission should mandate via its rules that a call originator must honor the request for call cessation based on a reassigned number status when their agent is informed by the called party or when a callback is received from the called party. This request should be presumed to apply immediately. Thus, any subsequent calls to the called party would subject the caller to TCPA liability.

This scheme provides benefits to both call originators and called parties who acquire a newly assigned number. The benefit to call originators is that this removes the ambiguity associated with constructive notice of “one free call.” Call originators have long complained that the first call to a reassigned number may go unanswered or picked up by an answering machine, and hence there is no actual notice received that the number has been reassigned. Call originators can maintain recordings of the calls, such that claims of providing actual notice can be investigated and verified. Failure to maintain recordings may result in a presumption that the called party provided actual notice.

The benefit for called parties is that they now know how they can provide actual notice and that once they provide actual notice, any calls intended for the prior subscriber should immediately cease. Further, if the call is unanswered, the called party knows that they can dial the indicated calling party number indicated on their caller ID and request that any calls directed to the old subscriber should cease. The Commission should mandate that calls to that number should be answered and any notices of actual notice are honored. If answered by an IVR, the party should be able to leave a message as actual notice.

Carriers and legitimate call center operators will not find these rules onerous. It is expected that they would prefer this approach from having to implement or use to use a national reassigned number database. Called parties will now have a clear mechanism for requesting cessation of such inadvertent calls, which does not exist today. There is a benefit for both call originators and called parties.

It can be expected that illegitimate call operators will ignore any Commission rules on this subject. But such illegitimate operators would not use a reassigned number validation service either. Illegitimate operators are not likely targeting specific individuals, and thus are not making inadvertent calls. If so, these calls are not a reassigned number problem, but a general disregard of the TCPA, which other solutions are being considered to address.

Call operators could still use currently available number validation services to identify reassigned numbers prior to receiving actual notice. Further, call operators could also still use such service providers to verify the status of a purportedly reassigned number. Call originators who fail to honor such requests and who continue calling the wrong person would be subject to existing TCPA private actions, and likely at trebled (willful) damage levels.

IX. A Solution To The Reassigned Number Solution Needs To Dovetail With Other Robocall Solutions (Shaken & Stir)

Any attempt to address the reassigned number problem must be coordinated with the other proposed robocall solutions. There seems consensus that Shaken & Stir is a long term solution for addressing illegal robocalls. That framework allows tracing a given call back to its point of signing, which would typically facilitate identification of the call originator. With this framework in mind, an illegal robocaller using an unauthorized spoofed calling party number will be identified and hopefully stopped or identified as such. Such calls may be blocked or identified with a label as “spam” when offered. These illegal call originators are not concerned about minimizing liability for calling reassigned numbers. In fact, such call originators typically do not seek out a particular person, and thus do not originate calls to the inadvertent person. These are not calls associated with the reassigned number problem.

On the other hand, if the call originator is a legitimate robocaller, Shaken & Stir will authenticate and attest to the calling party number, and the called party knows that they can call back the calling party number that is displayed and inform them that the number is reassigned. If the call is not answered, or if the request is not honored, then the called party can report it to regulators and the call can be traced. There is a motivation for legitimate robocallers to comply, because these calls can be traced. If the call originators want to maintain a “fully attested” status of the use of their calling party number, then that number has to support a call back allowing the called party to provide actual notice.

The Commission should consider that defining a clear and simple mechanism for the called party to provide actual notice of number reassignment could also be a clear and simple mechanism for a called party to revoke TCPA consent. Although this NOI is directed to reassigned numbers in a TCPA context, the called party in this context shares an interest with others in the TCPA context of revocation of consent. In both cases, an individual receiving calls wants to convey information to the calling party. In one case, it is a request for call cessation based on a reassigned number, and in the other case it is a revocation of consent for receiving autodialed calls.

One approach is to mandate call originators to accept revocation of consent of receiving autodialed calls (as well as actual notice of number reassignment) on three mandatory channels. First, call originators should offer a toll free number, answered by an agent or IVR for accepting revocation of consent. The call originator would also offer web site access to indicate revocation of consent. Finally, the call originator should offer an email address for receiving revocation of consent. All three channels should be posted on the call originator's web site. This does not preclude other channels from being used, but each entity originating calls subject to the TCPA must offer at least these channels. Similarly, a called party should be able provide actual notice of a reassigned number by using one of the above channels, in addition to the number shown on their caller ID display. Today, there is no method mandated allowing a party to provide actual notice of number reassignment. Although the Commission has stated that "any reasonable means" can be used, this does not mean that a call originator must provide a number, web site, or email address configured to receive such requests.

By offering certainty and simplicity, legitimate call operators will benefit as will the called party. Today, there is no mandated channel for a called party to indicate their number has been reassigned, nor is there a mandated channel that they know that they can use to revoke TCPA consent. The called party is left to find out what is a "reasonable means" and too often, litigation ensues. Defining certain channels for performing both of these functions (including actual notice of number reassignment and revocation of consent) is a simpler approach, more certain, and avoids developing a national reassigned number database infrastructure, which is questionable as to its effectiveness. This does not mean other channels could be used by a call center operator as well.

X. Conclusion

Noble Systems believes that a holistic approach should be taken to address the reassigned number problem. This scope of the reassigned number problem should not be conflated with the larger problem of illegal robocalls. The reassigned number problem is limited to a called party receiving *inadvertently* directed calls. Once the called party informs the caller, any further calls received are *not inadvertent*, but purposeful and willful, and outside the scope of the reassigned number problem.

Further, defining a national reassigned number database is likely to provide only a marginal improvement over existing number validation services. The existence of various number validation services available today significantly undercuts the motivation to incur the cost, complexity, and time required to build a national reassigned number database infrastructure that may be only marginally better, and does not promise to significantly reduce illegal calls. Mandating the developing infrastructure solutions for use by compliant call center operators to resolve the problems caused by illegal operators is a misguided effort. Further, if call originators are not mandated to use such a solution, then the entire effort appears to be largely equivalent to the status quo, where call originators frequently do not use available optional solutions today. Hence, the problem would continue to exist despite the investment of time, effort and money. In the meantime, called parties are left guessing as to how they can convey actual notice of a reassigned number or how they can convey revocation of consent to the call originator.

The Commission should instead define that call originators are required to act upon actual notice immediately and mandate specific channels by which called parties could use to indicate such actual notice. This approach provides call originators with certainty and provides simplicity for called parties, which presently neither party has.

Respectfully submitted,

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